

WILMER CUTLER PICKERING  
HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)  
Sonal.Mehta@wilmerhale.com  
2600 El Camino Real, Suite 400  
Palo Alto, California 94306  
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)  
David.Gringer@wilmerhale.com  
ROSS E. FIRSENBAUM (*pro hac vice*)  
Ross.Firsenbaum@wilmerhale.com  
RYAN CHABOT (*pro hac vice*)  
Ryan.Chabot@wilmerhale.com

PAUL VANDERSLICE (*pro hac vice*)  
Paul.Vanderslice@wilmerhale.com  
7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Telephone: (212) 230-8800

*Attorneys for Defendant Meta Platforms, Inc.*

ARI HOLTZBLATT (*pro hac vice*)

Ari.Holtzblatt@wilmerhale.com  
MOLLY M. JENNINGS (*pro hac vice*)  
Molly.Jennings@wilmerhale.com  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
Telephone: (202) 663-6000

MICHAELA P. SEWALL (*pro hac vice*)  
Michaela.Sewall@wilmerhale.com  
60 State Street  
Boston, Massachusetts 02109  
Telephone: (617) 526-6000

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF MOLLY JENNINGS  
IN SUPPORT OF META PLATFORMS,  
INC.'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL**

Judge: Hon. James Donato

1 I, Molly Jennings, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Meta  
3 Platforms, Inc. in the above-captioned action. I have personal knowledge of the matters stated  
4 herein and, if called upon, I could and would competently testify thereto.

5 2. Pursuant to Local Rule 79-5, I submit this Declaration in support of Meta's  
6 Administrative Motion to File Under Seal Meta's Motion to Exclude Testimony of Scott Fasser  
7 and Joshua Gans.

8 3. As will be discussed in a "more fulsome and revised motion to seal" after the  
9 completion of briefing pursuant to Paragraph 31 of this Court's Standing Order for Civil Cases,  
10 Meta's Motion to Exclude Testimony of Fasser and Gans and the accompanying exhibits include  
11 information that Meta designated as "Confidential" or "Highly Confidential" under the  
12 Stipulated Protective Order, Dkt. 314, which, if revealed to competitors or counterparties, could  
13 cause competitive harm to Meta.

14 4. Attached to this declaration are unredacted versions of the Motion and the  
15 accompanying exhibits.

16 5. Pursuant to Paragraph 31 of the Court's Standing Order for Civil Cases, Meta will  
17 file a combined Motion to Seal promptly after briefing on the Motions is complete and will work  
18 in good faith to minimize the amount of material sought to be sealed to ensure it is narrowly  
19 tailored in light of the right of public access to the record.

20 I declare that the foregoing is true and correct under penalty of perjury.

21 Executed on this 15th day of September, 2023, in Washington, D.C.

22  
23 By: /s/ Molly M. Jennings  
24 Molly M. Jennings  
25  
26  
27